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Robert Reynolds, Western National Mutual Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE
PAINTERS AND FLOORCOVERERS
JOINT COMMITTEE; *et al.*,

Plaintiffs,

vs.

SUPER STRUCTURES INC., a Nevada
corporation dba SUPER STRUCTURES;
SUPER STRUCTURES, INC., *et al.*,

Defendants.

CASE NO. 2:18-CV-01364-GMN-EJY

**JOINT MOTION TO EXTEND
DEADLINES TO FILE MOTION TO
RECONSIDER, RESPOND TO
ATTORNEY'S FEES MOTION AND
JOINT PRE-TRIAL ORDER
(SECOND REQUEST)**

COMES NOW, Defendants Super Structures, Inc. and Super Structures Inc. ("Super Structures") by and through their counsel of record, Marc P. Cook, Esq., of the law firm of Cook & Kelesis, Ltd., and Plaintiffs Board of Trustees of the Painters and Floor Coverers Joint Committee, et al. ("Plaintiffs"), by and through their counsel of record, Christensen James & Martin, Chtd. and pursuant to LR IA 6.1, hereby jointly move and request this Court to extend several deadlines as follows.

POINTS AND AUTHORITIES

On November 30, 2020, this Court entered its Order (ECF No. 62) granting Plaintiffs' Motion for Summary Judgment against Defendants Super Structures, denying Defendants' Motion for Summary Judgment, denying as moot Plaintiffs' Motion to Strike and denying as moot Defendants' Motion for Leave to File Excess Pages ("Summary Judgment Order"). The Summary Judgment Order set deadlines for the filing of a Status Report and a Joint Pretrial Order. On

December 14, 2020, Plaintiffs filed a Motion for Award of Attorney's Fees and Costs Against Judgment Debtors Super Structures, Inc. and Super Structures Inc. (ECF No. 63) ("Attorney's Fees Motion") based on this Court's Summary Judgment Order. Defendants intend to file a Motion to Reconsider this Court's Summary Judgment Order, which Defendants believe is due on January 19, 2021. The parties request that this Court extend the deadlines for one (1) week on the briefing of the Attorney's Fees Motion and the Motion to Reconsider this Court's Order (not yet filed) and for the filing of the Joint Pretrial Order. The Status Report has already been submitted by Plaintiffs on January 11, 2021 (ECF No. 68). Good cause exists to extend the time because Plaintiffs' and Defendants' attorneys are efforting to discuss possible resolutions. The requested extension will provide the parties with more opportunity to prepare and submit their pleadings. This is the second stipulation to extend the time by which the parties must file or answer the respective pleadings.

This will affect the schedule as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Motion to Reconsider	January 19, 2021	January 26, 2021
Opposition to Motion to Reconsider	February 1, 2021	February 8, 2021
Reply to Opposition to Motion to Reconsider	February 8, 2021	February 15, 2021
Opposition to Attorney's Fees Motion	January 19, 2021	January 26, 2021
Reply to Opposition to Attorney's Fees Motion	January 25, 2021	February 1, 2021
Joint Pretrial Order	January 20, 2021	January 27, 2021

This request for an extension of time is not sought for any improper purpose or other purpose of delay.

The parties respectfully submit that the reasons set forth above constitute good cause for the

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1 extension and deadlines requested above.

2 **IT IS SO STIPULATED.**

3 DATED this 19th day of January, 2021.

4 COOK & KELESIS, LTD.

CHRISTENSEN JAMES & MARTIN

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6 By: /s/ Marc P. Cook
7 Marc P. Cook, Esq.
8 Nevada Bar No. 4574
9 517 S. Ninth Street
Las Vegas, Nevada 89101
Attorneys for Defendants

By: /s/ Wesley J. Smith
Wesley J. Smith, Esq.
Nevada Bar No. 11871
7440 W. Sahara Avenue
Las Vegas, Nevada 89117
Attorneys for Plaintiffs

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13 **IT IS SO ORDERED** *nunc pro tunc*.

14 Dated this 20 day of January, 2021.

15 Submitted by:

16 COOK & KELESIS, LTD.

17 By: /s/ Marc P. Cook
18 Marc P. Cook, Esq.
19 *Attorneys for Defendants*


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On the 19th day of January, 2021, I caused to be served a true and correct copy of the foregoing **JOINT MOTION TO EXTEND DEADLINES TO FILE MOTION TO RECONSIDER, RESPOND TO ATTORNEY'S FEES MOTION AND JOINT PRE-TRIAL ORDER (Second Request)** by the method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY HAND DELIVERY:** at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY EMAIL:** by emailing a PDF of the document(s) listed above to the email address(es) of the individual(s) listed below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the United States District Court of Nevada for electronic filing and service upon the Court's Service List for the above-referenced case.

/s/ Shannon J. Fagin
An Employee of Cook & Kelesis, Ltd.